

ENSV Inspection Transmittal Summary Report

Media:
RCRA CONTRACTO

Inspection Type:
Other

Inspection Date:
05/23/2016

Preliminary SNC Findings:

Inspector:
BAH CONTRACTOR BAH CONTRACTOR

Transmittal Date:
7/26/2016

NOV / NOPV / NOPF:
No

JUL 26 2016

Facility Name:
Recycletronics

Address:
3313 Northbrook Drive
Sioux City
IA
51105

ID Number:

Activity Number:

MM Participating Programs:

Federal Activity:

Federal Facility:
No

Potential EJ:
No

SBREFA Provided:
Yes

Security Handout Provided:
Yes

MM Screening Completed:
Yes

EMS ISO 14001:
No

Compliance Officer:
DEBORAH BREDEHOFT

Selection Criteria 1:
Complaint/Case Development

Selection Criteria 2:

ACS Code:

Inspection Findings:

Target Quality:

non generator - complaint/case development.

RCRA



REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

AT

RECYCLETRONICS
3313 Northbrook Drive
Sioux City, IA 51105
(712) 224-3158

EPA RCRA ID No. Non Notifier

ON

May 23, 2016

BY

Booz Allen Hamilton

FOR

U.S. ENVIRONMENTAL PROTECTION AGENCY
Region 7
Environmental Sciences & Technology Division

INTRODUCTION

At the request of the Environmental Sciences & Technology Division (ENST) and the Environmental Field Compliance Branch (EFCB) of the U.S. Environmental Protection Agency (EPA) Region 7, Booz Allen Hamilton (Booz Allen) conducted a Resource Conservation and Recovery Act (RCRA) Compliance Evaluation Inspection (CEI) on May 23, 2016 at Recycletronics (Recycletronics) located in Sioux City, Iowa. The CEI was conducted under the authority of Section 3007(a) of RCRA, as amended. Booz Allen gathered information and data necessary for the EPA to determine compliance with applicable regulatory and statutory requirements. During the CEI it was discovered that Recycletronics currently is a non-generator of hazardous waste. The CEI was conducted as a level B Multimedia Screening Inspection, and the *Region 7 Multimedia Screening Checklist* is included as Attachment 1.

Recycletronics was last inspected on June 16, 2015 by an EPA contractor. The facility was cited at the end of the inspection for failing to minimize the possibility of a release.

PARTICIPANTS

The following persons participated in the CEI. A copy of the business card obtained from the facility representative during the CEI is included in Attachment 2.

Facility Representatives, Recycletronics:

Name	Title	E-mail/fax	Phone
Aaron Rochester	President	recycletronicsgm@cableone.net fax: (712) 224-3161	(712) 224-3158
Evere Gutierrez	Office Manager	recycletronicsgm@cableone.net fax: (712) 224-3161	(712) 224-3158

EPA Representative, Booz Allen:

Name	Title	E-mail/fax	Phone
Clifford A. Nelles	Environmental Specialist	nelles_clifford@ne.bah.com fax (816) 448-3801	(816) 448-3254

INSPECTION PROCEDURE

I arrived at Recycletronics at approximately 0915 hours on May 23, 2016 to conduct the visual reconnaissance. The visual reconnaissance was conducted to identify and document potential areas of concern from the adjacent roadways. I identified no environmental issues or areas of concern during this preliminary examination.

At approximately 0920 hours, I approached the main entrance and encountered Mr. Evere Gutierrez, I introduced myself to Mr. Gutierrez and explained the purpose of the CEI to him and asked to speak with the manager or owner. Mr. Gutierrez escorted me to the office of Mr. Aaron Rochester I introduced myself to Mr. Rochester, and explained the purpose of the CEI to him. I conducted the entry briefing in Mr. Rochester's office. I presented my EPA credential letter and business card to Mr. Rochester. During the entry briefing, I presented to Mr. Rochester a letter and business card from the EPA Task Order Contracting Officer's Representative (TOCOR), Mr. Gary Witkovski. I also presented Mr. Rochester with a copy of RCRA §3007(a) (stipulating hazardous waste inspection authority) and a copy of 42 U.S.C. 1001/1002 (requiring the provision of truthful and accurate information and documentation). These documents were read by Mr. Rochester prior to proceeding with the CEI.

I then explained the EPA policy regarding the collection of confidential business information (CBI) to Mr. Rochester. I stated that, at the conclusion of the CEI, he would be presented with the EPA *Confidentiality Notice*. At that time, a CBI claim could or could not be made for any or all of the information collected during the CEI.

The CEI consisted of a discussion of facility operations, waste generation and waste management practices; review of pertinent records; visual inspection; and an exit briefing. Mr. Rochester

acted as the official facility representative during the CEI, and accompanied me during the visual inspection. Mr. Gutierrez also participated in the inspection.

I completed the CEI and summarized my findings and recommendations on May 23, 2016 with Mr. Rochester. Based upon the initial observations, **I did not issue a Notice of Preliminary Findings (NOPF) to Recycletronics at the conclusion of the CEI.**

During the exit briefing, Mr. Rochester acknowledged receipt of the Confidentiality Notice (Attachment 3) with his signature. Mr. Rochester read and signed the Confidentiality Notice indicating no confidential business information had been provided during the CEI.

Mr. Rochester acknowledged receipt of a Receipt for Documents and Samples (Attachment 4). A total of eight (8) photographs were taken during the CEI, seven (7) of which are included in Attachment 5.

FINDINGS AND OBSERVATIONS

Facility Operations

Recycletronics was originally organized as a not-for-profit in 1990 as Disabled Veterans at Work. It was reorganized in 2011 as a for profit corporation and moved into the present facility in 2013. Recycletronics collects used electronic equipment (computer monitors, computers, printers, and televisions) from landfills, and by staging recycling events in various cities. Homeowners and businesses can drop off their used electronic equipment for recycling at these events. The used electronic equipment is then disassembled by Recycletronics and the components [wiring, circuit boards, cathode ray tubes (CRT), monitors, and cases] are sorted for recycling. Recycletronics processes CRTs for recycling by separating leaded glass from other components, this is done by taking CRTs to the glass room to separate into leaded and unleaded glass debris. All other electronic equipment is bundled on pallets and sold as-is to brokers for reuse or recycling. During the entry briefing I explained to Mr. Rochester that I would be asking for copies of Bills of Lading, invoices, and work orders. Mr. Rochester explained that the office computer that Mr. Gutierrez operated had just crashed on May 20, 2016 and that they did not have access to the company records. The facility consists of one building of approximately 16,000 sq. ft. Recycletronics's North American Industrial Classification System (NAICS) code is 811212 (Computer and Office Machine Repair and Maintenance without retailing New Computers).

Facility Status

Before conducting the CEI I received a series of emails on April 07, 2016 from Ms. Deborah Bredehoft (EPA) and Mr. Gary Witkovski (EPA) detailing previous interactions between Recycletronics the Iowa Department of Natural Resources (IDNR), Nebraska Department of Environmental Quality (NDEQ), and the EPA regarding the operations at Recycletronics. A copy of the emails is included in Attachment 6. On May 16, 2016 I conducted a phone conversation with Mr. Steve Griebel (IDNR) to see if he had any more information from Mr. Tony Wingert (Attachment 6, page 1). Mr. Griebel did not have any more information. I then contacted Mr. Wingert and he agreed to meet with me on Monday, May 23, 2016 at 0900, hours in his office to discuss his information.

I arrived at the Woodbury County Sheriff's Office at 0900 on May 23, 2016. Mr. Wingert stated that in March 2016 an anonymous informant had contacted him and that the informants' conscious was bothering him about the way that the lead from the CRTs was being managed. The informant told Mr. Wingert that the lead was being sold to be mixed in with concrete for paving. After leaving Mr. Wingert I then proceeded to the facility at 3313 Northbrook Drive. When I arrived I observed that the facility was not empty, but that Recycletronics is still in operation. I then proceeded to conduct a full CEI at the Recycletronics facility.

During the CEI, I determined Recycletronics's hazardous waste generation rate through interviews with facility personnel and record review.

Facility Waste Streams

The following is a Waste Stream and Waste Handling Table for Recycletronics. The table describes the major waste streams generated on-site, waste management practices, and off-site treatment, storage, and disposal. A description of the major waste streams and management practices is also found in the *CEI Worksheets and Checklists* (Attachment 7).

Waste Stream and Waste Handling Table Recycletronics– Sioux City, IA					
Name of Waste Stream	Hazardous Determination	Generating Process	Estimated Generation Rate	On-Site Management	Off-Site Management
1) Unleaded Glass	Nonhazardous by testing Toxic Characteristic Leaching Procedure (TCLP)	Disassembly of used electronic equipment	Unknown	Fiberboard containers in warehouse	Picked up by L.P. Gill for recycling at L.P. Gill Landfill in Jackson, NE.
2) General Trash	Nonhazardous by product/process knowledge	Office and facility refuse	Unknown	Various containers throughout the facility	Picked up by Waste Management for transport to the Woodbury County Landfill

Visual Inspection

The facility manufacturing activities generate the solid wastes listed in the Waste Stream and Waste Handling Table above. During the CEI, the generation and accumulation areas associated with these wastes were visually inspected. No site map was available for the facility but a Google Earth Image with the various areas noted is included as Attachment 8

In the main area of the facility the used electronic equipment is disassembled on workbenches using air driven tools. After disassembling the components are sorted and put into 1 cubic yard fiberboard containers, the circuit boards, wiring, and monitor parts, are sold as-is online, and the plastics are sent to SW Recycling in Willmar, MN. The unleaded glass is sent to L.P. Gill Landfill in Jackson, NE for recycling. Copies of scale tickets for L.P. Gill Landfill emailed to Mr. Rochester by L.P. Gill Landfill on May 23, 2016 and dated January 12, 19, 20, and 28, 2016 are included in Attachment 9. Mr. Rochester stated that the leaded glass is sent to either The Doe Run Company in Doe Run, Missouri or Closed Loop Refining and Recovery in Phoenix, Arizona for recycling. Mr. Rochester contacted the shipping company that he used and requested that they either fax or email the invoices to him. After several calls to the company that day he had still not received them by the end of the CEI. I then instructed Mr. Rochester to send the invoices to me either by fax or email to the fax number or email address on my business card that I gave him in the entry briefing. A copy of the emails sent from me to Mr. Rochester on May 31, 2016 and June 01, 2016 requesting this information is included as Attachment 10. At the time of the writing of this report I have not received the requested information.

I asked Mr. Rochester if a hazardous waste determination has been made on the unleaded glass that is sent to the landfill. He stated that a determination has been made through testing. A reference in Attachment 6, page 4 to TCLP data sent to the EPA on September 18, 2015 states that the unleaded glass is below TCLP levels.

In the Glass room I observed a 1-cubic yard container for unleaded glass and scrap metal (Attachment 5, Photo 1). In the Glass room the leaded glass from CRTs and the unleaded glass is sorted into different containers. When a container of leaded glass is full the lid is put on and the lid and container is shrink wrapped. In the Glass room I observed a bundled container of leaded glass ready for shipment (Attachment 5, Photo 2). I asked Mr. Gutierrez how often the facility ships out leaded glass. He stated that leaded glass is only shipped out when they have a semi-trailer load ready, and the quantity on hand and what they ship out varies as there is not a steady influx of used electrical equipment for processing. He also stated that shipments of processed used electronic equipment parts and unleaded glass only go out when they have a full trailer load.

In the main warehouse area I observed over 50 fiberboard containers of unprocessed used electronic equipment including CRTs (Attachment 5, Photo 3).

In the front of the facility outside on the driveway, I observed 24 bales of processed electronic equipment waste (Attachment 5, Photo 4). The bales hold plastic and metal ready to be sent to be recycled. In the front of the facility outside on the driveway I observed 24 1-cubic yard containers of unprocessed electronic equipment waste (Attachment 5, Photo 5). I asked Mr. Rochester why the containers of unprocessed equipment were setting outside. He stated that the facility had just conducted a recycling event the previous week and that they had received eight semi-trailer loads of used electronic equipment on the weekend. He also stated that he has an agreement with the City of Sioux City, Iowa that he will have all of the unprocessed equipment inside by Wednesday May 25, 2016. Before leaving the facility I photographed the front from the roadway (Attachment 5, Photos 6-7). All of the material in Photos 4 and 5 are in between the white bus and the red bus in Photo 7.

I asked Mr. Rochester if Recycletronics performed the maintenance on their fork truck. He stated that the maintenance was performed by Riekes Equipment Company directly across the street from the facility. He also stated when maintenance was needed the fork truck was driven over there and the maintenance is performed at the Riekes Equipment Company. A copy of a bill for fork truck maintenance from Riekes Equipment dated May 19, 2016 is included as Attachment 11.

During the visual inspection I did not observe any used oil or universal waste in storage. I asked Mr. Rochester if the facility has generated any waste lamps. He stated that since they moved into the facility in 2013 they have not had to replace any used lamps. I asked Mr. Rochester if he owned the facility. He stated that he rented the facility from Raintree Properties and that Mr. Dan Henderson was his landlord and has been for the last three years.

Records

- Invoices from L.P. Gill dated January 12, 19, 20, and 28, 2016 (Attachment 9)

Since Recycletronics computer had crashed three days before the inspection and Mr. Rochester had not received the requested invoices by the end of the CEI there were no other records to review.

On May 23, 2016, I conducted an exit interview with Mr. Rochester. I explained the findings and observations noted during the CEI, and the regulations pertaining to each. Additionally, I provided Mr. Rochester with copies of the following materials:

- Copy of RCRA §3007(a)
- Copy of 42 U.S.C. 1001/1002
- EPA Information Sheet: *Commercial Motor Vehicle Transportation System Security & Safety-CMV Transportation Security Planning*
- EPA Homeland Security Bulletin: *US EPA Region 7, December 2001, Security Awareness for Agricultural/Industrial Facilities, Pipelines, Transporters, Utilities, Warehouses of Chemicals*

- EPA Supplemental Information for Small Businesses Subject to a U.S. EPA Enforcement Action

SUMMARY

Through a review of current operations and interviews with facility personnel, I determined that Recycletronics is a non-generator of hazardous waste.

Other than items specifically noted in the narrative, I observed no additional issues. However, further review by EPA might change or add to my findings.



 Clifford A. Nelles

Date: 07/20/2014

ATTACHMENTS

- 1: Region 7 Multimedia Screening Checklist (2 pages)
- 2: Copies of Facility Representatives' Business Card (1 page)
- 3: Copy of the EPA Confidentiality Notice (1 page)
- 4: Copy of Receipt of Documents (1 page)
- 5: Photographic Documentation (5 pages)
- 6: Copy of Emails from Deborah Bredehoft and Gary Witkovski (12 pages)
- 7: CEI Worksheets and Checklists (8 pages)
- 8: Copy of Google Earth Image (1 page)
- 9: Copy of Scale Tickets from L.P. Gill (3 pages)
- 10: Copy of Emails sent from Clifford Nelles to Aaron Rochester dated May 31, 2016 and June 01, 2016 (1 page)
- 11: Copy of a Bill from Riekes Equipment for fork truck maintenance dated May 19, 2016 (1 page)

REGION VII MULTIMEDIA SCREENING CHECKLIST

Facility Name: RECYCLETRONICS Inspector: CLIFFORD ALAN NELLES
 Facility Ownership: RAINTREE PROPERTIES Primary Media: RCRA
 Street: 3313 NORTHBROOK DRIVE Inspector Phone Ext.: 816-448-3254
 City: SANIT SIOUX CITY State: IA Zip: 51105 Date: 05/23/2016
 Phone: 712-224-3158 Facility Contact: AARON ROCHESTER SIC/NAICS Code: 811212
 Number of Employees: 5 Work Hours/Shifts: 0700-1730 TU-F Facility Subject to OSHA regulations Yes ☒ No ☒ can

Main facility activity, major process chemical(s) & description: ELECTRONIC EQUIPMENT RECYCLER

(Check all that apply): painting/coating (water-based ☐, solvent-based ☐) , printing ☐ , reacting ☐ , formulating ☐ , distilling ☐ , water treatment ☐ , refrigeration ☐ , manufacturing ☐ , parts washers/degreasing (water-based ☐ , halogenated-based ☐ , non-halogenated-based ☐) , combustion (boiler, furnaces, oxidizers) ☐ plating (chrome ☐ , other _____).

ENVIRONMENTAL JUSTICE (Note: Forward to EJ if a concern is identified during your inspection)

1. Is the facility located in an apparent low income area (e.g., with many abandoned and dilapidated properties)? No ☒ (stop) Yes ☐
 If yes, is facility less than 1000 feet from nearest routinely occupied property (house, school, etc.)? No ☐ (stop) Yes ☐ **Forward to EJ**

EMERGENCY PLANNING & COMMUNITY RIGHT TO KNOW ACT (EPCRA) & TOXIC SUBSTANCE CONTROL ACT (TSCA)

1. Did facility file a Tier II report with fire department, Local & State Emergency Planning Committee? Yes ☐ No ☒ **Forward to EPCRA**
 2. Did facility manufacture, import, or process (formulate, blend, package) >25,000 lbs of a chemical or >100 lbs of a Persistent Bioaccumulative Toxin (lead, mercury, or polycyclic aromatic compounds) at any time over the last 5 years? No ☒ (stop) Yes ☐ **Forward to EPCRA**
 3. Has the facility: **If any box in question 3 is marked - Forward to EPCRA**
 a. Stored ≥500 lbs of ammonia ☐ , ≥100 lbs of chlorine ☐ , or ≥10,000 lbs of an industrial chemical ☐ , at any time over the last 2 years? ☐
 b. Stored ≥10,000 lbs of pressurized flammable material (propane, methane, butane, pentane, etc.) at any time over the last 2 years? ☐
 c. Used ≥10,000 lbs of ammonia ☐ , chlorine ☐ , halogenated solvents ☐ , solvent-based paints ☐ , or solvents ☐ , or nitrated compound, over the last calendar year? ☐
 d. Generated ≥ one half pound of metal dusts, fumes, or metal turnings, over the last calendar year? ☐
 4. Does the facility have any oil filled electrical equipment No ☒ (stop) Yes ☐ **Forward to TSCA and ask** Has facility tested oil filled equipment to determine PCB content; No ☐ Yes ☐ number containing PCBs greater than 50 ppm _____ and percent of all equipment tested _____. Is equipment leaking (including wet or weeping equipment)? No ☐ Yes ☐ - **Get Photo**

CLEAN WATER ACT (CWA) - National Pollution Discharge Elimination System (NPDES), Industrial Pretreatment, Storm Water, & Wetlands

1. Does the facility discharge any wastewater to storm sewers, surface water, or the land? No ☒ (stop) Yes ☐
 If yes, are all wastewater discharges permitted? Yes ☐ No ☐ **Forward to CWA**
 2. Does the facility have process wastewaters that are discharged to a city POTW (Publicly Owned Treatment Works)? No ☒ (stop) Yes ☐
 If yes, are the discharges permitted by: State? ☐ , City? ☐ - If yes, Stop here. No ☐ **Forward to CWA**
 If yes, does the city have a state or EPA approved pretreatment program? Yes ☐ No or Don't Know ☐ **Forward to CWA**
 3. During rainfall events, can storm water carry pollutants from manufacturing, processing, storage, disposal, shipping and receiving areas, or from construction sites >1 acre, to storm sewers or surface water? No ☒ (stop) Yes ☐
 If yes, does the facility have an NPDES permit for these storm water discharges? Yes ☐ No ☐ **Forward to CWA**
 4. Did you see any wastewater discharges not identified by the facility? No ☒ (stop) Yes ☐ - Identify location, time, appearance of discharge: _____
 (Get Photo) **Forward to CWA**
 5. Does the facility have any wetland areas (e.g. streams, ponds, or temporarily wet areas)? No ☒ (stop) Yes ☐
 If yes, have any wetland areas been dredged, filled, channelized, dammed, or had gravel removed from them within the last 5 years?
 No ☐ (stop) Yes ☐ - Identify location and timeframe _____ (Get Photo) **FWD to Wetlands**

SAFE DRINKING WATER ACT (SDWA) - Underground Injection Control (UIC) & Public Water System (PWS)

1. Does facility discharge any liquids to the subsurface (septic systems, disposal wells, cesspools, etc.)? No ☒ (stop) Yes ☐ **Forward to UIC**
If yes, do these liquid wastes consist of sanitary wastewater only? Yes ☐ No ☐
2. Does facility provide drinking water to 25 people or more from its own source (private well, pond, etc)? No ☒ (stop) Yes ☐ **Forward to PWS**
If yes, does the facility test or monitor its drinking water in order to comply with state regulations? Yes ☐ No ☐

CLEAN AIR ACT (CAA) and CFCs

1. Do you see any dense, non-steam, smoke or dust emissions leaving the facility property? No ☒ Yes ☐ **Forward to CAA**
Source _____ (Get Photo)
2. Does the facility have any new air pollution emitting equipment that was constructed or installed in the past 5 years? No ☒ (stop) Yes ☐
If yes, is equipment permitted? Yes ☐ No ☐ **Forward to CAA** Describe: _____
3. Does the facility have any cooling units that contain >50 lbs of refrigerant? No ☒ (stop) Yes ☐ **Forward to CFC**
If yes, are these units: Self-serviced? ☐ Contract Serviced? ☐ - Service Company: _____
4. Does the facility have a refrigeration process that contains more than 10,000 lbs of ammonia? No ☒ (stop) Yes ☐ **Forward to EPCRA/RMP**
5. Does the facility service motor vehicle air conditioning systems? No ☒ (stop) Yes ☐ **Forward to CFC**

RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) and UNDERGROUND STORAGE TANKS (UST)

1. Does the facility generate more than 30-gallons (220 lbs./100kg) of hazardous waste per month or at any one time? No ☒ (stop) Yes ☐
If yes, does facility have an EPA Hazardous Waste Identification Number? Yes ☐ (stop) No ☐ **Forward to RCRA**
2. Is hazardous waste treated ☐ , stored >90-days ☐ , burned ☐ , land filled ☐ , put in surface impoundments ☐ or waste piles ☐ ?
No ☒ (stop) Yes ☐ If yes, is the facility permitted for above described activity? Yes ☐ No ☐ **Forward to RCRA**
3. Did you see or does the facility have any large quantities of materials **that the facility claims to be non-hazardous waste material** (>10 drums, roll-offs, waste piles, etc. - exclude clean office trash, cardboard, & packaging type wastes)? No ☒ (stop) Yes ☒
- | <u>Material Claimed To Be Non-Hazardous</u> | <u>How does the facility know these wastes are non-hazardous?</u> |
|---|--|
| <u>BROKEN CRT GLASS</u> | Testing, industry or manuf. info., MSDS, etc. <input checked="" type="checkbox"/> ; None available <input type="checkbox"/> Forward to RCRA |
| _____ | Testing, industry or manuf. info., MSDS, etc. <input type="checkbox"/> ; None available <input type="checkbox"/> Forward to RCRA |
| _____ | Testing, industry or manuf. info., MSDS, etc. <input type="checkbox"/> ; None available <input type="checkbox"/> Forward to RCRA |
| _____ | Testing, industry or manuf. info., MSDS, etc. <input type="checkbox"/> ; None available <input type="checkbox"/> Forward to RCRA |
| _____ | Testing, industry or manuf. info., MSDS, etc. <input type="checkbox"/> ; None available <input type="checkbox"/> Forward to RCRA |
4. Did you see any leaking hazardous waste containers, drums, or tanks? No ☒ Yes ☐ **Forward to RCRA**
Describe: _____ (Get Photo)
5. Did you see any signs of spills or releases (e.g., dead or stressed vegetation, stains, discoloration)? No ☒ Yes ☐ **Forward to RCRA**
Describe: _____ (Get Photo)
6. Did you see any chemical or waste handling practices that concern you (access to children/public)? No ☒ Yes ☐ **Forward to RCRA & EPCRA** Describe: _____ (Get Photo)
7. Does the facility have any past or present underground petroleum product or hazardous material tanks? No ☒ Yes ☐ **Forward to UST**
8. Does the facility have any underground fuel tanks for emergency generators? No ☒ Yes ☐ **Forward to UST**

SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN (SPCC)

1. Does the facility have any aboveground oil tanks (petroleum, synthetic, animal, fish, vegetable), with an aggregate volume >1,320 gallons?
No ☒ (stop) Yes ☐ - Does the facility have a certified SPCC Plan? Yes ☐ No ☐ **Forward to SPCC**
If yes, are there secondary containment systems for the tanks? Yes ☐ No ☐ **Forward to SPCC**
If yes, are any tanks leaking where oil could reach waters of the State or U.S.? No ☐ Yes ☐ (Get Photo) **Forward to SPCC**

ENVIRONMENTAL MANAGEMENT SYSTEMS (EMS)

1. Does your facility have an EMS? No ☒ Yes ☐
2. Is the facility's EMS ISO 14001 certified? No ☒ Yes ☐

*** PLEASE TAKE PHOTOS TO DOCUMENT POTENTIAL PROBLEMS**



RECYCLETRONICS™
DISABLED VETS AT WORK

Aaron J. Rochester
President

Office & Recycling Center:
3313 Northbrook Drive
Sioux City, IA 51105

O: 712.224.3158
C: 712.253.4547
F: 712.224.3161
E: recycletronicsgm@cableone.net

EPA QUALIFIED • 100% RECYCLE • 0% LANDFILL

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
CONFIDENTIALITY NOTICE

Facility Name RECYCLETRONICS	
Facility Address 3313 NORTHBROOK DRIVE SIOUX CITY, IOWA 51105	
Inspector (print) CLIFFORD ALAN NELLES	
U.S. EPA, Region VII, 901 N. 5th St., Kansas City, KS 66101 BOOZ ALLEN HAMILTON	Date 05/23/2016

The United States Environmental Protection Agency (EPA) is obligated, under the Freedom of Information Act, to release information collected during inspections to persons who submit requests for that information. The Freedom of Information Act does, however, have provisions that allow EPA to withhold certain confidential business information from public disclosure. To claim protection for information gathered during this inspection you must request that the information be held CONFIDENTIAL and substantiate your claim in writing by demonstrating that the information meets the requirements in 40 CFR 2, Subpart B. The following criteria in Subpart B must be met:

1. Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.
2. No statute specifically requires disclosure of the information.
3. Disclosure of the information would cause substantial harm to your company's competitive position.

Information that you claim confidential will be held as such pending a determination of applicability by EPA.

I have received this Notice and <u>DO NOT</u> want to make a claim of confidentiality at this time.	
Facility Representative Provided Notice (print) Cyr. Tho Aaron Rochester	Signature/Date 5/23/16

I have received this Notice and <u>DO</u> want to make a claim of confidentiality.	
Facility Representative Provided Notice (print)	Signature/Date

Information for which confidential treatment is requested:

Facility Name	RECYCLETRONICS
Facility Address	3313 NORTHBROOK DRIVE, SIOUX CITY, IOWA 51105

PHOTO LOG

Facility Name / City: RECYCLETRONICS
3313 Northbrook Drive
SIOUX CITY, IA 51105

Facility ID #: NONE

Date: May 23, 2016

Photographer: Clifford A. Nelles

Type of Camera: Sony Digital Still Camera, DSC-W690, Serial #6653306

Digital Recording Media: Memory Stick

All digital photos were copied by: Rebecca A. Wenner on, 2016

All digital photos were copied to: to print and CD-R

Original copy is stored in: CD-R. All digital photos were downloaded to CD-R by Rebecca A. Wenner on 2016. No changes were made in the original image files prior to print and storage on the CD-R. Camera was not reset after previous use.

Report Photo #	Photographer	Date	Approx. Time	File Name (DSC00xxx.jpg)	Description
1	Clifford A. Nelles	05/23/16	0943	0025	1 cubic yard non-lead glass storage container in Glass room. Container holds non-lead glass and scrap metal
2	Clifford A. Nelles	05/23/16	0945	0027	Lead glass bundled ready for shipment. When the 1 cubic yard container is full the lid is put on to it and the container is shrink wrapped.
3	Clifford A. Nelles	05/23/16	0946	0028	50 unprocessed containers of electronic equipment waste inside of facility
4	Clifford A. Nelles	05/23/16	0949	0029	24 bales of processed electronic equipment waste outside of building. Waste is plastic and metal ready to be sent to be recycled
5	Clifford A. Nelles	05/23/16	0949	0030	24 1-cubic yard containers of unprocessed electronic equipment waste outside of the building
6	Clifford A. Nelles	05/23/16	1025	0031	Westside of the front of the building looking North. Photo taken from Northbrook Drive
7	Clifford A. Nelles	05/23/16	1025	0032	Eastside of the front of the building looking North. Photo taken from Northbrook Drive. Material shown in Photos 4 and 5 is located in between the white bus and the red bus.

RECYCLETRONICS
SIOUX CITY, IA

Photo Number: 1
Photographer: Clifford Nelles
Date: 05/23/2016
Time: 0943
Description: 1 cubic yard non-
leaded glass storage container in
warehouse. Container holds non-
leaded glass and scrap metal



Photo Number: 2
Photographer: Clifford Nelles
Date: 05/23/2016
Time: 0945
Description: Leaded glass
bundled ready for shipment. When the
1 cubic yard container is full the lid is
put on to it and the container is shrink
wrapped.



RECYCLETRONICS
SIOUX CITY, IA

Photo Number: 3
Photographer: Clifford Nelles
Date: 05/23/2016
Time: 0946
Description: 50 unprocessed
containers of electronic equipment
waste inside of facility



Photo Number: 4
Photographer: Clifford Nelles
Date: 05/23/2016
Time: 0949
Description: 24 bales of
processed electronic equipment waste
outside of building. Waste is plastic
and metal ready to be sent to be
recycled



RECYCLETRONICS
SIOUX CITY, IA

Photo Number: 5
Photographer: Clifford Nelles
Date: 05/23/2016
Time: 0949
Description: 24 1-cubic yard
containers of unprocessed electronic
equipment waste outside of the
building



Photo Number: 6
Photographer: Clifford Nelles
Date: 05/23/2016
Time: 1025
Description: Westside of the
front of the building looking North.
Photo taken from Northbrook Drive



RECYCLETRONICS
SIOUX CITY, IA

Photo Number: 7
Photographer: Clifford Nelles
Date: 05/23/2016
Time: 1025
Description: Eastside of the front
of the building looking North. Photo
taken from Northbrook Drive.
Material shown in Photos 4 and 5 is
located in between the white bus and
the red bus.



[External] FW: Recycletronics Inspection Report

Witkovski, Gary [Witkovski.Gary@epa.gov]

Sent: Friday, April 15, 2016 07:37 AM

To: Nelles, Clifford (MBO Partners)

One more thing to ask.

From: Bredehoft, Deborah

Sent: Monday, April 11, 2016 4:41 PM

To: Witkovski, Gary <Witkovski.Gary@epa.gov>

Subject: FW: Recycletronics Inspection Report

Gary –

I'm not sure if I have passed this along to you, but could you have Cliff look into if Recycletronics was receiving car batteries and turning them into anything.

Thanks!

Deborah

From: Koesterer, Elizabeth

Sent: Monday, March 14, 2016 3:30 PM

To: Bredehoft, Deborah <bredehoft.deborah@epa.gov>; Hoefer, David <Hoefer.David@epa.gov>

Subject: RE: Recycletronics Inspection Report

Deb – Dave and I chatted really quickly about this, as part of another conversation....

Here's the info I was given this morning:

Steve Griebel of the IDNR called me this morning. (712-301-4009) He is a conservation officer stationed in the Sioux City area. He took a call last Friday from Tony Wingert, (712-490-4869) Lieutenant with the Woodbury County Sherriff's office. Tony was contacted by an anonymous informant and told that Recycletronics in Sioux City was accepting car batteries from the east coast, and turning the batteries into road bed material. Money comes into the business for the batteries, but no money goes out for disposal purposes.

Steve contacted Julie Sievers at the IDNR (712-260-0625) regarding who should follow up on this information, and Julie told Steve to contact us at the EPA.

I don't know how old the information might be from the informant, but we should follow up with Lt. Wingert. If you're in the office tomorrow, stop by. Or call me if you're AWL.

Beth

From: Bredehoft, Deborah

Sent: Monday, March 14, 2016 11:47 AM

To: Hoefer, David <Hoefer.David@epa.gov>; Koesterer, Elizabeth <Koesterer.Elizabeth@epa.gov>

Subject: FW: Recycletronics Inspection Report

They were sent the inspection report (as part of Don's previous coordination with Mike) and attached is the response that I received from Kim. However, this is from last fall, before the facility closed.

From: Bahney, Kimberly

Sent: Thursday, September 24, 2015 3:50 PM

ATTACHMENT 6 Page 1 of 12

To: Bredehoft, Deborah <bredehoft.deborah@epa.gov>

Subject: RE: Recycletronics Inspection Report

Thank you! We have closed the lead, in part due to the inspection findings.

Kim

Special Agent Kimberly Bahney
United States Environmental Protection Agency
Criminal Investigation Division
11201 Renner Boulevard
Lenexa, KS 66219
Office: 913-551-7278
Cell: 913-333-0352
Fax: 913-551-7891

From: Bredehoft, Deborah

Sent: Thursday, September 24, 2015 3:22 PM

To: Bahney, Kimberly

Subject: Recycletronics Inspection Report

Deborah Bredehoft
Environmental Engineer
RCRA Compliance Officer
USEPA/AWMD/WEMM
Phone: 913-551-7164
Fax: 913-551-9164
E-mail: Bredehoft.Deborah@epa.gov

Any questions contact me.

From: Bredehoft, Deborah
Sent: Wednesday, April 06, 2016 1:49 PM
To: Witkovski, Gary <Witkovski.Gary@epa.gov>
Cc: Koesterer, Elizabeth <Koesterer.Elizabeth@epa.gov>
Subject: Recycletronics Follow Up Inspection

Gary –

Attached below is the contact information that Milady Peters (CNSL) was able to find out about the Recycletronic's Facility. If access is needed, it appears that we would probably need to reach out to the land/building owner – L and L Book Properties.

I will also pass along the information that NDEQ has provided on the site in Nebraska.

I'm looking for a follow up inspection to document what remains at the both properties by providing the following:

- Primarily photos
- Lists of what types of containers were observed and where they were located
- Approximate volumes and/or numbers of containers
- If the containers are labeled, please let me know what labeling is on the containers
- Etc.

Background information previously provided:

Locations:

Recycletronics
 3313 Northbrook Drive
 Sioux City, Iowa 51105

Lin-Du, LLC
 2301 G Street
 South Sioux City, NE

Background:

At Iowa Facility:

- EPA inspected on 6/16/15 (by Heather Wood – TOEROEK Associates, Inc.).
 - Began operating at this location in 2013 (based on research, was evicted in Fall 2015)
 - Had 7 employees
 - Receives electronic equipment (computer monitors, computers, printers, and televisions) by truck. Facility processes CRTs for recycling by separating leaded glass from other components. All other electronic equipment is bundled on pallets and sold as-is to brokers for reuse or recycling.
 - Recent surges prior to inspection caused staging of equipment behind the warehouse (~30, 1-cubic yard cardboard containers outside the warehouse) – based on satellite images (from 10/14/14), may have been occurring longer
 - Processing of CRTs occurs by taking CRTs to glass room to separate into leaded and unleaded glass debris.
 - Inspected as non-generator of hazardous waste.
 - Representative stated that CRTs are typically processed and sent for recycling within a month and

ATTACHMENT 6 Page 3 of 12

that the oldest leaded glass is less than 6 months old.

- Leaded glass sent to either Closed Loop Refining and Recovery in Phoenix, Arizona (smelted in Columbus, Ohio) or Technologies Displays America in Calexico, California (smelted in Mexicali, Baja California, Mexico).
- Observed ~60, 1-cubic yard cardboard containers of leaded glass debris in the warehouse (accumulated ~6 months) and approximately 40 containers in the glass room (accumulated ~2 months).
- Observed ~12 cardboard, 1-cubic yards of unleaded glass debris in front of the warehouse (generate ~24 cubic yards of unleaded glass debris per month) – stated to be collected by Gill Hailing of Sioux City, Iowa to be used as aggregate or fill.
- Cited facility for failing to minimize the possibility of a release
- Court Records indicate that in November 2015, the landlord/property owner was granted an eviction against Recycletronics. (It appears that L and L Properties owns the property – but no further contact information was provided)
- EPA reviewed the inspection and sent an information request on 12/1/15 – the letter was returned to EPA (it was not accepted at the facility)
- Based out finding out about the eviction of Recycletronics, EPA found the home address of the registered agent and sent the letter to the home address – the letter was mailed from EPA and signed for on 2/22/16.
 - As of 3/28/16, no response has been received from EPA for the signed letter

At Nebraska Facility:

- Photos of Nebraska location: from Donnie Zach at NDEQ
 - 10/5/15 – 3 photos taken by NDEQ of crushed CRTs on property owned by Lin-Du, LLC (generated by Recycletronics)
 - 1/27/16 – 3 additional photos taken by NDEQ of crushed CRTs on property owned by Lin-Du, LLC (generated by Recycletronics)
 - Photos show piles of uncontainerized CRT glass in large piles. The pile is covered by snow in 1/27/16 photos.
- On 9/18/15, Recycletronics sent TCLP data that indicates that the unleaded glass is below TCLP levels.
- NDEQ sent 11/17/15 letter strongly recommending that the crushed CRT glass be managed under the CRT processing exclusion (including discussing storing the material in a building with floor, roof, and walls, or be stored in closed containers in a way that minimized releases to the environment.

I'm looking to have an inspector go up (hopefully in the next couple of weeks) and get a current assessment of the facility locations in both Iowa and Nebraska to see if the materials were removed or remain at both locations.

From: Peters, Milady

Sent: Monday, February 01, 2016 11:50 AM

To: Bredehoft, Deborah <bredehoft.deborah@epa.gov>

Cc: Hoefer, David <Hoefer.David@epa.gov>; Rock, Anna <Rock.Anna@epa.gov>; Gonzales, Amy <Gonzales.Amy@epa.gov>; Moreno, Sarah <moreno.sarah@epa.gov>

Subject: RE: Letter to be delivered in IA

Deb,

I found Recycletronics. I don't think that sending mail to the 3313 Northbrook address will be fruitful, it appears Recycletronics was evicted in November 2015.

ATTACHMENT 6 Page 4 of 12

<https://webmail.bah.com/owa/?ae=Item&a=Open&t=IPM.Note&id=RgAAAAAE%2f9SuB...> 4/7/2016

Here's what I found:

Doing some reverse looking, I found Mr. Rochester on Facebook and figured out how he had his company organized. (I did not find Mr. Rochester on LinkedIn.)

The legal company is named The Name Ministries and the fictitious name is Disabled Veterans at Work – Recycletronics. It is registered as a nonprofit. It was registered in 1990 and administratively dissolved in 8/2013.

The registered agent for The Name Ministries/Disabled Veterans at Work - Recycletronics was changed in 2009 to Aaron Rochester, 301 W 7th Street, Sioux City, IA 51103, and that is the last Registered Agent on record. In 2011, Recycletronics informed the IA secretary of state that their "home office" was being changed to from 6000 Gordon Drive (the former registered agent's address) to 1219 5th Street, the Recycletronics recycling center at the time. I noticed, however, that their "Office" on the letterhead was still 301 W. 7th Street. I don't see any reference to the 3313 Northbrook address in the Secretary of State filings and the Secretary of State sent the administrative dissolution to the 301 W 7th Street address.

In searching court records, it looks like in 11/2015, the landlord/property owner at 3313 Northbrook was granted an eviction against Recycletronics. The case is in Woodbury County, case no. 03971-SCCV167994 from 11/2015.

Debtor Information

Debtor 1

Name: RECYCLETRONICS

Address: 3313 NORTHBROOK DR
SIOUX CITY, IA 51105-2449
WOODBURY COUNTY

Debtor 2

Name: ROCHESTER, AARON

Address: 3313 NORTHBROOK DR
SIOUX CITY, IA 51105-2449
WOODBURY COUNTY

Creditor Information

Name: L AND L BOOK PROPERTIES

Filing Information

Filing State: IOWA

Filing Date: 11/10/2015

Eviction: YES

Filing 1

Filing Number: SCCV167994

Filing Type: FORCIBLE ENTRY/DETAINER

Filing Date: 11/10/2015

Filing Court: WOODBURY DISTRICT COURT-SIOUX CITY

Filing County: WOODBURY

Filing Office: IA

There are several very recent judgements out there against Mr. Rochester/Recycletronics in Woodbury county as well.

In addition to The Name Ministries and Disabled Veterans at Work – Recycletronics, other businesses associated with Mr. Rochester include Royal Charters, Inc., which also operated out of the 3313 Northbrook address and still has an active web site (www.royalchartersinc.com), although the information on the site appears to only go as far as February 2015. If you look up Royal Charter's Facebook page, customer comments go up to 11/2015, and they're not pretty. It sounds like the business just sort of vanished in November leaving at least one customer high and dry.

Mr. Rochester is a former Sioux City Councilman.



Milady Peters | Paralegal Specialist

Office of Regional Counsel | U.S. Environmental Protection Agency, Region 7
11201 Renner Boulevard, Lenexa, Kansas 66219

☎ Phone: (913) 551-7168 | 📠 Fax: (913) 551-7925 | ✉ peters.milady@epa.gov

From: Bredehoft, Deborah

Sent: Monday, February 01, 2016 9:38 AM

To: Peters, Milady <peters.milady@epa.gov>; Hoefer, David <Hoefer.David@epa.gov>; Rock, Anna <Rock.Anna@epa.gov>; Gonzales, Amy <Gonzales.Amy@epa.gov>; Moreno, Sarah <moreno.sarah@epa.gov>

Subject: RE: Letter to be delivered in IA

Yes – I sent it to the 3313 Northbrook Drive, Sioux City address. I spoke with NDEQ and they told me that the 5th street address is out of date.

The owner is Aaron Rochester.

Thanks for your help with this!

Deborah

From: Peters, Milady

Sent: Monday, February 01, 2016 9:12 AM

To: Hoefer, David <Hoefer.David@epa.gov>; Rock, Anna <Rock.Anna@epa.gov>; Gonzales, Amy <Gonzales.Amy@epa.gov>; Moreno, Sarah <moreno.sarah@epa.gov>

Cc: Bredehoft, Deborah <bredehoft.deborah@epa.gov>

Subject: RE: Letter to be delivered in IA

I don't know what the business address is. If it's a PO Box, we're limited on things we can do. If it is a street address, we have options.

I looked up "Recycletronics" and "Recycle Tronics" in the Iowa Secretary of State, and I can't find a company registered by that name. Do you have an owner name or another corporate name I could look under?

I did a quick Google search and found two addresses in Sioux City for a Recycletronics. Are either one of these the address in question?

1219 5th Street, Sioux City

ATTACHMENT 6 Page 6 of 12

3313 Northbrook Drive, Sioux City



Milady Peters | Paralegal Specialist

Office of Regional Counsel | U.S. Environmental Protection Agency, Region 7

11201 Renner Boulevard, Lenexa, Kansas 66219

☎ Phone: (913) 551-7168 | 📠 Fax: (913) 551-7925 | ✉ peters.milady@epa.gov

From: Hoefer, David

Sent: Monday, February 01, 2016 9:02 AM

To: Peters, Milady <peters.milady@epa.gov>; Rock, Anna <Rock.Anna@epa.gov>; Gonzales, Amy <Gonzales.Amy@epa.gov>; Moreno, Sarah <moreno.sarah@epa.gov>

Subject: RE: Letter to be delivered in IA

Business address.

From: Peters, Milady

Sent: Monday, February 01, 2016 7:09 AM

To: Hoefer, David <Hoefer.David@epa.gov>; Rock, Anna <Rock.Anna@epa.gov>; Gonzales, Amy <Gonzales.Amy@epa.gov>; Moreno, Sarah <moreno.sarah@epa.gov>

Subject: RE: Letter to be delivered in IA

Is the address a street address or a PO Box?



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11201 Renner Boulevard, Lenexa, Kansas 66219

☎ Phone: (913) 551-7168 | 📠 Fax: (913) 551-7925 | ✉ peters.milady@epa.gov

From: Hoefer, David

Sent: Friday, January 29, 2016 7:05 PM

To: Rock, Anna <Rock.Anna@epa.gov>; Gonzales, Amy <Gonzales.Amy@epa.gov>; Moreno, Sarah <moreno.sarah@epa.gov>; Peters, Milady <peters.milady@epa.gov>

Subject: Fwd: Letter to be delivered in IA

See Deb's question below. With certified mail the recipient needs to accept and sign, which apparently is not happening here. I believe that we have used registered mail which doesn't require a signature by the recipient but the USPS documents delivery. Any other (e.g., IPS, FedEx) options that you'd recommend? Thanks.

Begin forwarded message:

From: "Bredehoft, Deborah" <bredehoft.deborah@epa.gov>

Date: January 29, 2016 at 2:36:16 PM CST

To: "Koesterer, Elizabeth" <Koesterer.Elizabeth@epa.gov>, "Hoefer, David" <Hoefer.David@epa.gov>

Subject: Letter to be delivered in IA

ATTACHMENT 6 Page 7 of 12

Beth and Dave –

I have tried to have a letter delivered by certified mail to Recycletronics in Iowa. The letter was returned to me as unclaimed. I have made 2 attempts to call the facility since receiving the unclaimed letter and left messages each time – I have not received a returned phone call.

I called NDEQ and they said that their letter (I'm uncertain if it was sent as certified or general mail) was sent to the same address and they have not received it back.

Would it be better to:

- try to send it again under certified mail;
- do we have an inspector going up near the Sioux City area that could deliver the letter and sign an affidavit that they hand delivered the letter; or
- should we seek to have the letter served?

If I could get ahold of someone at their facility via the phone and let them know that the letter was coming, I would feel more comfortable sending the letter again, but I have yet to get ahold of someone on the phone when I have called.

We told NDEQ that we would continue to look into this matter and a reporter has been calling about a facility that they have taken some of the glass to in Nebraska, so we do need to have the letter delivered somehow.

Thoughts?

Thanks!

Deborah Bredehoft
Environmental Engineer
RCRA Compliance Officer
USEPA/AWMD/WEMM
Phone: 913-551-7164
Fax: 913-551-9164
E-mail: Bredehoft.Deborah@epa.gov



Nebraska Department of Environmental Quality

To: File

Through: Jeff Edwards, Waste Management Compliance Unit Supervisor

From: Donnie Zach, Program Specialist

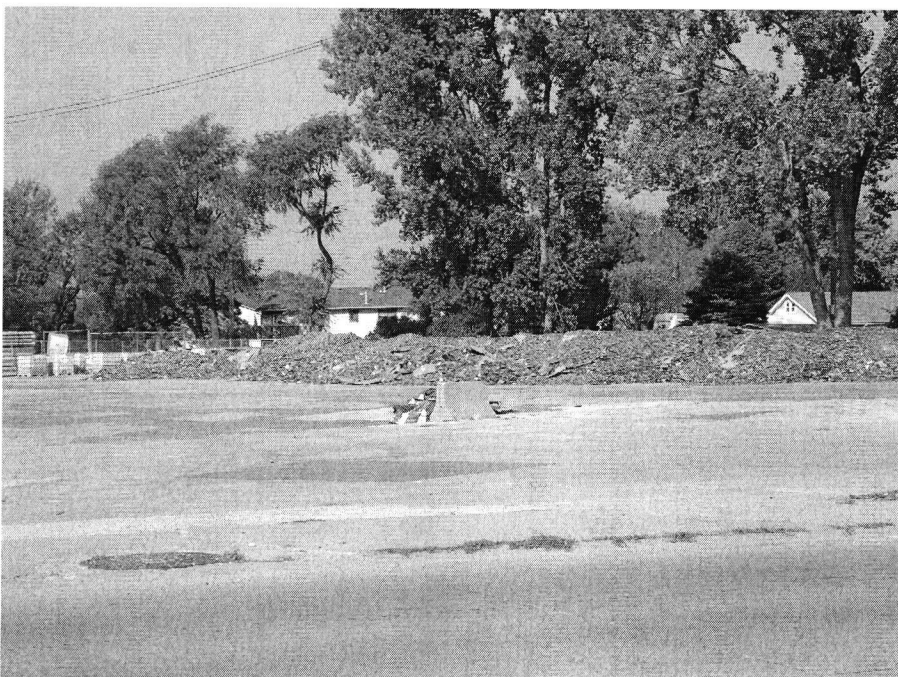
Date: 2/10/16

RE: Lin-Du, LLC
2301 G Street, South Sioux City, NE

Recycletronics
3313 Northbrook Dr., Sioux City, IA 51105

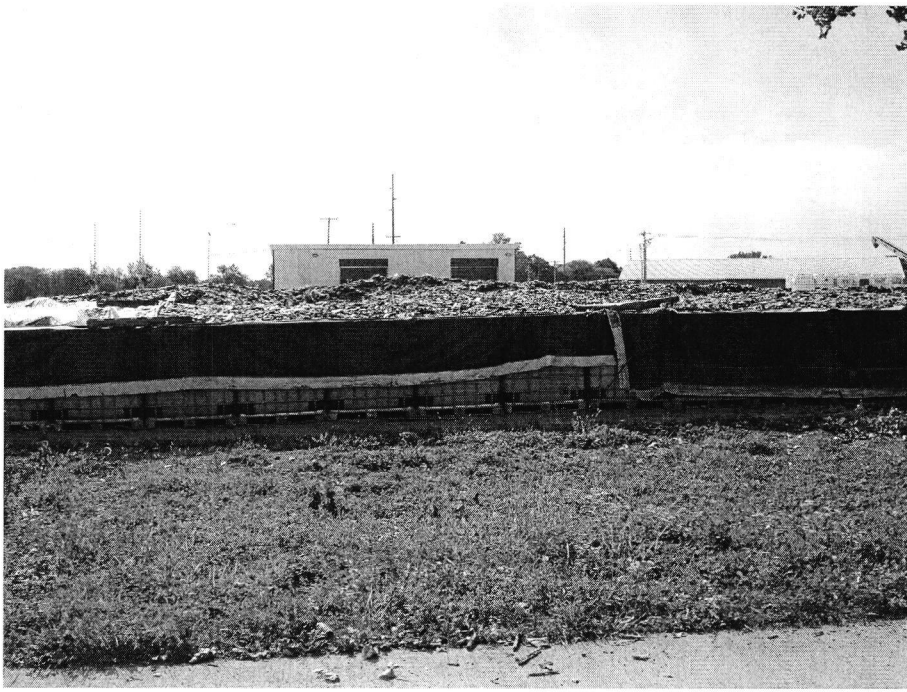
Complaint #: 091015-JE-0900
NDEQ ID: IIS #: 7338

The purpose of this memo is to provide photos for the file of piles of crushed glass located at 2301 G Street in South Sioux City, NE. Six total photos are included and three were taken on October 5, 2015 and three on January 27, 2016 by Dallas Dorey of NDEQ's Norfolk Field Office. The photos show piles of crushed cathode ray tubes on property owned by Lin-Du, LLC and generated off-site in Iowa by Recycletronics.

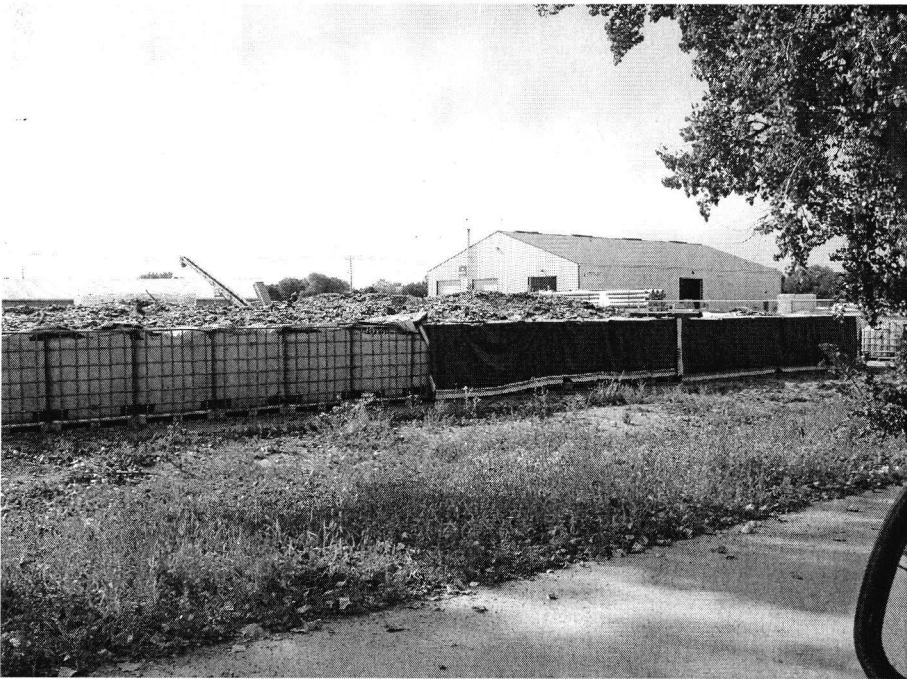


Photograph #1
Date: October 5, 2015
Photographer: Dallas Dorey
IIS#: 7338
Subject: Recycletronics /
Lin-Du, LLC.

Waste Management Section Memorandum



Photograph #2
Date: October 5, 2015
Photographer: Dallas Dorey
IIS#: 7338
Subject: Recycletronics /
Lin-Du, LLC.



Photograph #3
Date: October 5, 2015
Photographer: Dallas Dorey
IIS#: 7338
Subject: Recycletronics /
Lin-Du, LLC.



Photograph #4
Date: January 27, 2016
Photographer: Dallas Dorey
IIS#: 7338
Subject: Recycletronics /
Lin-Du, LLC.



Photograph #5
Date: January 27, 2016
Photographer: Dallas Dorey
IIS#: 7338
Subject: Recycletronics /
Lin-Du, LLC.

Waste Management Section Memorandum



Photograph #6

Date: January 27, 2016

Photographer: Dallas Dorey

IIS#: 7338

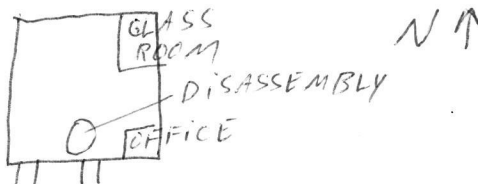
Subject: Recycletronics /
Lin-Du, LLC.

Appendix 1-3

Facility: RECYCLETRONICS Date: 05/23/2016 Arrival time: 0915

DRIVE-BY

1. Drive-by conducted from public right-of-way? ☒ Yes ☐ No
2. Determine the direction "North" with respect to the facility and provide a brief sketch of the layout and orientation (as can be viewed from the public right-of-way):



3. Obvious concerns visible from public right-of-way (photos)? ☐ Yes ☒ No
- | | | | |
|--------------------|--------------------|------------------------|-----------------------|
| - Containers | - Tanks | - Processing Equipment | - Loading Areas |
| - Unloading Areas | - Security Devices | - Open Drums | - Stressed Vegetation |
| - Unusual Staining | - Unusual Odors | - Obvious Discharges | - Improper Disposal |
| - Safety Concerns | - Other Concerns | | |

Appendix 1-4

SITE ENTRY AND INBRIEFING

1. ☒ Used main entrance ☒ Entered during normal operating hours ☐ Excessive delays (>15 minutes - denial of access?) - ☒ No

2. Facility Representative(s): AARON ROCHESTER Title: PRESIDENT
EVERE GUTIERREZ Title: OFFICE MANAGER
Title: _____

3. Does representative have intimate knowledge of all waste management practices? ☒ Yes ☐ No

How long in position? 15 YEARS

4. Introduction:

- ☒ Presented credentials
- ☒ Explained responsibility to provide accurate information and provided copies of Section 1001 and 1002 U.S.C. to facility
- ☒ Verified presence at correct facility (checked address/I.D. #)
- ☒ Explained authority to conduct inspection (Section 3007 of RCRA)
- ☒ Explained the purpose, scope, and order of the inspection
- ☒ Completed Multimedia screening checklist
- ☒ Explained documentation process - worksheets, checklists, photos, notes, statements, etc
- ☒ Provided SBRFA
- ☐ Obtained GPS reading
- ☒ Explained facility's right to claim CBI

5. Was full access granted? ☒ Yes ☒ By facility representative or Other (name): _____
☐ No - Access denied. Name of person denying access: _____

Time of denial: _____

Reason for denial, or limitations placed on access:

FACILITY BACKGROUND WORKSHEET

Date facility began operating: _____ Number of employees: 5

Number of shifts/hour worked: _____ Number of days worked per week: _____

Size (sq. ft., how divided): 16,000 ONE BUILDING

Property owner and facility operator the same? ☐ Yes ☒ No

RAINTREE PROPERTIES

2. Major products or services provided: RECYCLING USED ELECTRONIC EQUIPMENT

3. Major raw materials used: _____

4. Major manufacturing or processing operations which generate waste streams: (provide brief description)

Operation/Process

SEE WASTE^{TE} STREAM WORKSHEETS

Waste Stream(s)

SEE WASTESTREAM WORKSHEETS

5. Complete a Generator Waste Stream Worksheet and/or Off-Site Waste Stream Worksheet for the waste streams noted above and then finish this form.

6. Verified/compared above information with facility Notification Form: ☐ Yes ☐ No

NO NOTIFICATION FORM

7. **GENERATOR STATUS:** (based on records review)

☒ Non-generator

☐ CE (0-100kg/mo or 1 kg/mo acute waste and accumulate <1000 kg or 1kg acute waste or 100 kg of acute spill residue)

☐ SQG (100-1000kg/mo and accumulate <6000kg)

☐ LQG (>1000kg/mo)

Is facility's status solidly within above category?
(If not carefully verify status and document)

☒ Yes ☐ No

8. **TSD STATUS:**

☐ Treatment

☐ Storage

☐ Disposal

Note: Types of units, number of units, capacities, processes, etc:

CAN

9. Resolved questions from Pre-Inspection Worksheet?

☐ Yes

☐ No

☒ No Questions

10. Resolved compliance officer's questions from Pre-Inspection Worksheet?

☐ Yes

☐ No

☒ No Questions

11. Requested site map or diagram to identify all observations?

☐ Yes

☒ None Available

Appendix 1-6

GENERATOR WASTE STREAM WORKSHEET

1. WASTE STREAM: UNLEADED GLASS
 FACILITY DETERMINATION: ☐Hazardous ☒Non-hazardous ☐Not done ☐Inadequate
 WASTE CODES: NONE
 DETERMINATION METHOD: ☐Product knowledge ☐Process knowledge ☒Testing
 Documentation: TCLP ANALYTICAL
 GENERATING PROCESS: SORTING OF CRT'S LEADED GLASS
 GENERATION RATE: UNKNOWN
 ON-SITE MANAGEMENT: Satellites ☐Visually inspected Storage ☒Visually inspected
STORED IN FIBERBOARD CONTAINERS
 OFF-SITE MANAGEMENT/DISPOSITION: PICKED UP BY L.P. GILL FOR RECYCLING

2. WASTE STREAM: GENERAL TRASH
 FACILITY DETERMINATION: ☐Hazardous ☒Non-hazardous ☐Not done ☐Inadequate
 WASTE CODES: NONE
 DETERMINATION METHOD: ☒Product knowledge ☒Process knowledge ☐Testing
 Documentation: _____
 GENERATING PROCESS: OFFICE AND FACILITY REFUSE
 GENERATION RATE: UNKNOWN
 ON-SITE MANAGEMENT: Satellites ☐Visually inspected Storage ☒Visually inspected
VARIOUS CONTAINERS THROUGHOUT FACILITY
 OFF-SITE MANAGEMENT/DISPOSITION: PICKED UP BY WASTE MANAGEMENT FOR LANDFILL

3. WASTE STREAM: _____
 FACILITY DETERMINATION: ☐Hazardous ☐Non-hazardous ☐Not done ☐Inadequate
 WASTE CODES: _____
 DETERMINATION METHOD: ☐Product knowledge ☐Process knowledge ☐Testing
 Documentation: _____
 GENERATING PROCESS: _____
 GENERATION RATE: _____
 ON-SITE MANAGEMENT: Satellites ☐Visually inspected Storage ☐Visually inspected
 OFF-SITE MANAGEMENT/DISPOSITION: _____

D. PERSONNEL TRAINING

(SQG – 262.34(d)(5)(iii), LQG's – 262.34(a)(4) referencing 265.16, I.S.-265.16 only)

#	√ / X	REGULATORY REQUIREMENTS*	COMMENTS
1.		Program director trained in hazardous waste management procedures (LQG only)→265.16(a)(2)	
2.		Employees do not work unsupervised without completing training & are trained within 6 mo. of initial hiring (LQG only)→265.16(b)	
3.		Employees are trained annually (LQG only)→265.16(c)	
4.		Job title & name of person filling position specified (LQG only)→265.16(d)(1)	
5.		Written job description including: skills, education or qualification, and duties (LQG only)→265.16(d)(2)	
6.		Written description of type and amount of introductory & continuing training provided (LQG only)→265.16(d)(3)	
7.		Training covers: response to emergencies, implementation of contingency plan, use of alarms, waste feed cut-offs & other emergency equipment, as required (LQG only)→265.16(a)(3)	
8.		Documentation confirming training has been completed (LQG only)→265.16(d)(4)	
9.		Records maintained on-site for current employees & for 3 years for former employees→265.16(d) & (e) respectively	
10.		All employees are familiar with waste handling and emergency procedures relevant to their responsibilities (SQG only)→262.34(d)(5)(iii)	

√ - in compliance X - not in compliance N/A - not applicable * - please note applicable permit requirements

11. Notes/Observations:

E. WASTE ANALYSIS/WASTE DETERMINATION AND LAND DISPOSAL RESTRICTIONS

1. Location of waste analysis/waste determination records: AARON ROCHESTER'S OFFICE

2. Person responsible for waste analysis/waste determination: AARON ROCHESTER

#	✓ X	REGULATORY REQUIREMENTS*	COMMENTS
3.	✓	Determines if waste is a hazardous waste-262.11	
4.	✓	Determines if waste is restricted from land disposal-262.11(d)→268.7(a)(1)	
5.	✓	Determines waste does <u>not</u> meet applicable treatment standards (ATS)-268.7(a)(2)	
a.	NA	One time written notice submitted to treatment or storage facility with initial shipment and a copy placed in file-268.7(a)(2)	
b.	NA	SQG disposes of waste under a contractual or tolling agreement-268.7(a)(10). (LDR Notice available for the initial shipment and copy of LDR Notice kept for 3 years after termination of agreement)	
6.	NA	Waste covered by a National Capacity Variance(s)-268 Subpart C, Extension, or Petition-268.5 & 6. (Describe the variance, extension, or petition that applies)	
a.	NA	Provides a notice to the land disposal facility with the initial shipment, or a revised notice if changes occur, stating that the waste is exempt from the LDRs-268.7(a)(4).	
7.	NA	Ships waste(s) covered by the LDRs off-site for treatment or disposal-268.7(a)(2). If no, go to 8.	
a.	NA	Provides a notice with initial shipment, or new notification, if changes occur-268.7(a)(2)	
b.	NA	Notice includes: EPA hazardous waste number(s), manifest number(s), waste analysis data, if available, and waste constituents, wastewater or non-wastewater classification, and subcategory, if applicable-268.7(a)(2)→268.7(a)(4)	
8.	NA	Determined waste to be excluded from the definition of hazardous or solid waste, or exempt from Subtitle C regulations under 261.2 thru 261.6 subsequent to the point of generation-268.7(a)(7)	
a.	NA	Retains a one-time notice describing the generation, subsequent exclusion or exemption, and the disposition of the waste, in the facility's on-site files-268.7(a)(7). (If soil contaminated with waste, a special certification statement is included with the notice-268.7(a)(2)(i))	
9.	NA	Determines waste or soil contaminated with waste does meet the ATS or does not exceed prohibition levels and requires no further treatment-268.7(a)(3)	
a.	NA	One time written notice submitted to treatment or storage facility with initial shipment and a copy placed in file-268.7(a)(3)(i)	
10.	NA	Additional special rules regarding waste that exhibits a characteristic-268.9	

Tank #2 – Name & location of tank: _____

Person responsible for tank area: _____

Age of tank when it first stored/treated/held a hazardous waste: _____

How was age verified? _____

Tank design capacity: _____ Type of waste in tank: _____

Volume currently in the tank: _____ How was volume verified? _____

Length of time in tank: ☐ <90 day ☐ <180 day ☐ <270 day ☐ I.S. ☐ Permit

Photos taken? ☐ YES ☐ NO Photo numbers: _____

Area noted on map or diagram: ☐ YES ☐ NO

Tank #3 – Name & location of tank: _____

Person responsible for tank area: _____

Age of tank when it first stored/treated/held a hazardous waste: _____

How was age verified? _____

Tank design capacity: _____ Type of waste in tank: _____

Volume currently in the tank: _____ How was volume verified? _____

Length of time in tank: ☐ <90 day ☐ <180 day ☐ <270 day ☐ I.S. ☐ Permit

Photos taken? ☐ YES ☐ NO Photo numbers: _____

Area noted on map or diagram: ☐ YES ☐ NO

Tank #4 – Name & location of tank: _____

Person responsible for tank area: _____

Age of tank when it first stored/treated/held a hazardous waste: _____

How was age verified? _____

Tank design capacity: _____ Type of waste in tank: _____

Volume currently in the tank: _____ How was volume verified? _____

Length of time in tank: ☐ <90 day ☐ <180 day ☐ <270 day ☐ I.S. ☐ Permit

Photos taken? ☐ YES ☐ NO Photo numbers: _____

Area noted on map or diagram: ☐ YES ☐ NO

Appendix 1-10

EXIT BRIEFING

1. Reviewed all data collected and documented all concerns or violations? ☒ Yes ☐ No
- Location of the violation, type and amount of waste involved, time frame, frequency, specific dates & when first started occurring.
 - Illegal units-unit location (diagram/picture), dimensions, conditions, construction material, gradient of the base (for spills), other information.
 - Illegal disposal-how, when (each occurrence), where sent or disposed of, how shipped, who shipped, when shipped/disposed of, quantity.
- ☒ Identified/verified violations from previous inspection were corrected (if applicable)
- ☒ Addressed all unresolved inspection related issues
- ☒ Summarized findings and observations for the facility representatives
- NO PF*
NOV issued? ☐ Yes ☒ No ☐ Violations clearly identified and explained, including: circumstances, location, and applicable regulations
- ☒ Explained the importance of a timely (14 day) and adequate response
- ☒ Explained that findings and observations are based on your current knowledge of RCRA and that the final findings may differ
- ☒ Explained that compliance officer will make final compliance decisions and that all compliance questions should be directed toward them
- ☒ Explained that recommendations provided are for informational purposes only and DO NOT require specific actions by the facility
- ☒ Provided facility with CBI form
- ☒ Prepared Document Receipt form

3. Specific information requested from facility? ☒ Yes ☐ No

INVOICES FROM LEAD SHIPMENTS

4. Facility appears to have awareness of RCRA regulations? ☒ Yes ☐ No

5. Facility has its own environmental staff? ☐ Yes ☒ No

6. Facility has copy of applicable regulations? ☒ Yes ☐ No

7. Attitude and demeanor of facility representative(s); ☒ OK ☐ Not OK

8. Notes/Observations:



L.P. GILL, INC.
P.O. BOX 126
JACKSON, NE 68743

000144 GILL HAULING, INC.
1364 HWY 20
JACKSON NE 68743

Recycletronics

SITE	TICKET	GRID		WEIGHMASTER	
02	559011			HEATH	
DATE IN	DATE OUT	TIME IN	TIME OUT	VEHICLE	ROLL OFF
01/12/16	01/12/16	15:38	16:01	144 301	
REFERENCE			ORIGIN		
RECYCLE					

Scale 1 Gross Wt. 72320 LB
Scale 1 Tare Wt. 26380 LB
Net Weight 45940 LB

Inbound - Charge ticket

QUANTITY	UNIT	DESCRIPTION	RATE	EXTENSION	FEE	TOTAL
22.97	TON	Solid Waste				

Operating hours 6AM to 5PM Mon.-Fri., 6AM to 11:30AM on Sat

I certify that to the best of my knowledge there are no hazardous or prohibited materials in this load.

NET AMOUNT
TENDERED
CHANGE
CHECK NO.

Hauler: GILL HAULING, INC.

SIGNATURE 

L.P. GILL, INC.
P.O. BOX 126
JACKSON, NE 68743

000914 RECYCLETRONICS
3313 NORTHBROOK DRIVE
SIOUX CITY IA 51105

SITE	TICKET	GRID		WEIGHMASTER	
02	559726			Marilyn	
DATE IN	DATE OUT	TIME IN	TIME OUT	VEHICLE	ROLL OFF
01/19/16	01/19/16	12:34	12:56	144 301	
REFERENCE			ORIGIN		

Scale 1 Gross Wt. 80360 LB
Scale 1 Tare Wt. 39300 LB
Net Weight 41060 LB

Inbound - Charge ticket

QUANTITY	UNIT	DESCRIPTION	RATE	EXTENSION	FEE	TOTAL
20.53	TON	Solid Waste				

Operating hours 6AM to 5PM Mon.-Fri., 6AM to 11:30AM on Sat

I certify that to the best of my knowledge there are no hazardous or prohibited materials in this load.

NET AMOUNT
TENDERED
CHANGE
CHECK NO.

Hauler: GILL HAULING, INC.

SIGNATURE 

L.P. GILL, INC.
P.O. BOX 126
JACKSON, NE 68743

000914 RECYCLETRONICS
3313 NORTHBROOK DRIVE
SIOUX CITY IA 51105

SITE	TICKET	GRID		WEIGHMASTER	
02	559888			Marilyn	
DATE IN	DATE OUT	TIME IN	TIME OUT	VEHICLE	ROLL OFF
01/20/16	01/20/16	11:47	12:14	144 301	
REFERENCE		ORIGIN			

Scale 1 Gross Wt. 72380 LB
Scale 1 Tare Wt. 38540 LB
Net Weight 33840 LB

Inbound - Charge ticket

QUANTITY	UNIT	DESCRIPTION	RATE	EXTENSION	FEE	TOTAL
16.92	TON	Solid Waste				

Operating hours 6AM to 5PM Mon.-Fri., 6AM to 11:30AM on Sat

I certify that to the best of my knowledge there are no hazardous or prohibited materials in this load.

NET AMOUNT
TENDERED
CHANGE
CHECK NO.

Hauler: GILL HAULING, INC.

SIGNATURE



L.P. GILL, INC.
P.O. BOX 126
JACKSON, NE 68743

000914 RECYCLETRONICS
3313 NORTHBROOK DRIVE
SIOUX CITY IA 51105

SITE	TICKET	GRID		WEIGHMASTER	
02	560927			Marilyn	
DATE IN	DATE OUT	TIME IN	TIME OUT	VEHICLE	ROLL OFF
01/28/16	01/28/16	11:44	12:06	144 301	
REFERENCE		ORIGIN			

Scale 1 Gross Wt. 80760 LB
Scale 1 Tare Wt. 40460 LB
Net Weight 40300 LB

Inbound - Charge ticket

QUANTITY	UNIT	DESCRIPTION	RATE	EXTENSION	FEE	TOTAL
20.15	TON	Solid Waste				

Operating hours 6AM to 5PM Mon.-Fri., 6AM to 11:30AM on Sat

I certify that to the best of my knowledge there are no hazardous or prohibited materials in this load.

NET AMOUNT
TENDERED
CHANGE
CHECK NO.

Hauler: GILL HAULING, INC.

SIGNATURE



000914 RECYCLETRONICS
3313 NORTHBROOK DRIVE
SIOUX CITY IA 51105

SITE	TICKET	GRID	WEIGHMASTER		
02	560967		Marilyn		
DATE IN	DATE OUT	TIME IN	TIME OUT	VEHICLE	ROLL OFF
01/28/16	01/28/16	13:47	14:11	144 301	
REFERENCE		ORIGIN			

Scale 1 Gross Wt.	78820	LB	Inbound - Charge ticket
Scale 1 Tare Wt.	39540	LB	
Net Weight	39280	LB	

QUANTITY	UNIT	DESCRIPTION	RATE	EXTENSION	FEE	TOTAL
19.64	TON	Solid Waste				

NET AMOUNT
TENDERED
CHANGE
CHECK NO.

SIGNATURE _____

Nelles, Clifford (MBO Partners)

From: Nelles, Clifford (MBO Partners)
Sent: Wednesday, June 01, 2016 2:33 PM
To: recycletronicsgm@cableone.net
Subject: RE: Bills of Lading or Invoices

Importance: High

Aaron:
It is imperative that I have the information that I requested in order to finish my report. Send this as soon as possible

CLIFFORD A. NELLES

MBO Environmental Specialist

2300 Main Street Tel: 816-448-3254
Suite 900 Cell: 816-213-5192
Kansas City, MO 64108 nelles_clifford@ne.bah.com

From: Nelles, Clifford (MBO Partners)
Sent: Tuesday, May 31, 2016 09:22 AM
To: recycletronicsgm@cableone.net
Cc: Nelles, Clifford (MBO Partners)
Subject: Bills of Lading or Invoices

Aaron:
I need the copies of the Bills of Lading or Invoices from your last two shipments of lead sent to me.

Thank you

CLIFFORD A. NELLES

MBO Environmental Specialist

2300 Main Street Tel: 816-448-3254
Suite 900 Cell: 816-213-5192
Kansas City, MO 64108 nelles_clifford@ne.bah.com

RIEKES EQUIPMENT CO.
6703 L STREET
OMAHA, NE 6811700000, US
4025931181

Store #1001273273

05/19/16 08:52:33 AM

Retail Sale

Billing Address

DISABLED VETS AT WORK
301 W 7TH ST.
SIOUX CITY, IA
51101

Shipping Address

DISABLED VETS AT WORK
301 W 7TH ST.
SIOUX CITY, IA
51101

Credit Card Information

CREDIT CARD NUMBER: Amex5008
SWIPE CARD: No
STATUS: APPROVED - 131174
ORDER NUMBER: SRV0200121
PO NUMBER: PHONE

Qty	Unit Cost	Extended Cost
1	698.21	698.21
SUBTOTAL:		\$698.21
TAX:		\$76.79
TOTAL:		\$775.00

Customers are always #1.

RECORD CONTROL CHECK SHEET

Media

Air	RCRA	Water	Other
	X		

Date of Inspection 05/23/2014

Activity Number 3724

Facility ID Number NONE

Facility Name and Address RECYCLETRONICS
3313 NORTHBROOK DRIVE
SIoux CITY, IOWA 51105

The following documents pertaining to this activity are contained in the package:

<u>Document</u>		<u>Yes</u>	<u>No</u>	<u>NA</u>
Final Report with attachments	<u>44</u> Pages	(X)	()	()
Field sheets	<u>—</u> Pages	()	()	(X)
Chain of Custody	<u>—</u> Pages	()	()	(X)
Analytical data sheets	<u>—</u> Pages	()	()	(X)
Pre-inspection documents	<u>—</u> Pages	()	()	(X)
Photographic negatives (if applicable)	<u>—</u> Pages	()	()	(X)
Photographs (not included in this report)	<u>2</u> Pages	(X)	()	()
CD-ROM containing <u>8</u> photos/videos	<u>1</u> CD-ROM	(X)	()	()
Field notebook w/ <u>—</u> pages used	<u>—</u> Notebook	()	()	(X)
Other documents (list below)				
<u>FIELD NOTES</u>	<u>1</u> Pages			
<u>—</u>	<u>—</u> Pages			
<u>—</u>	<u>—</u> Pages			
<u>—</u>	<u>—</u> Pages			

(Note: If additional space is needed to list specific documents, utilize reverse side)

CERTIFICATION

I, the undersigned, certify that all of the documents pertaining to this activity that were in my possession have been listed above and were included in this package at the time this statement was signed.

Clifford A. Nelles 07/27/2014
 Activity Leader's Signature and Date CAN

Facility Name / City: RECYCLETRONICS
3313 Northbrook Drive
SIOUX CITY, IA 51105

Facility ID #: NONE

Date: May 23, 2016

Photographer: Clifford A. Nelles

Type of Camera: Sony Digital Still Camera, DSC-W690, Serial #6653306

Digital Recording Media: Memory Stick

All digital photos were copied by: Rebecca A. Wenner on /2016

All digital photos were copied to: to print and CD-R

Original copy is stored in: CD-R. All digital photos were downloaded to CD-R by Rebecca A. Wenner on /2016. No changes were made in the original image files prior to print and storage on the CD-R.

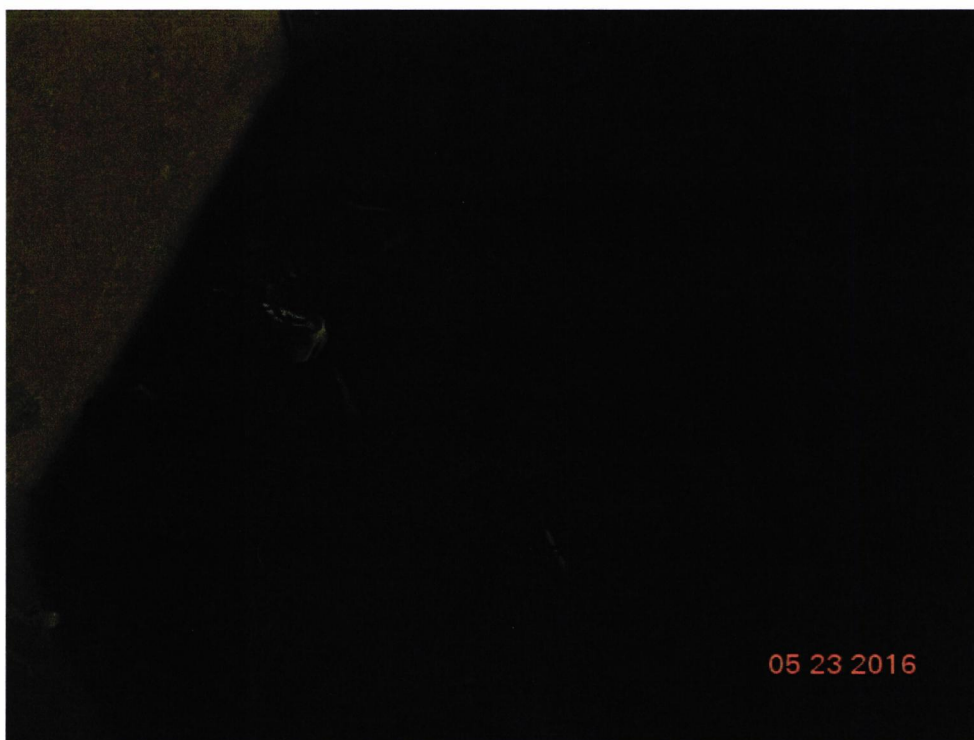
Report Photo #	Photographer	Date	Approx. Time	File Name (DSC00xxx.jpg)	Description
1	Clifford A. Nelles	05/23/16	0944	026	Photo not used in report.

Photos Not Included in CEI Report

RECYCLETRONICS
SIOUX CITY, IA

Photos Not Included in CEI Report

Photo Number: 1
Photographer: Clifford Nelles
Date: 05/23/2016
Time: 0944
Description: Photo not used in
report.



Recycletronics 5/23/2016 0915
haef - semi trucking Highway 20
2010 for Sioux PC and electronic recycling
Cali industries TU-FRI 10 hours
Del Run CRT
Eure Gutierrez
5 up
recycle events 8 loads last weekend!
printers to precs steel
SW recycling Minn
35 boxes unprocessed inside
15
16,000 sq ft - 2 bays storage on E side
48 24 shipped out 24 non processed
Raintree Properties - Dan Henderson

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

AT

RECYCLETRONICS

3313 Northbrook Drive
Sioux City, IA 51105
(712) 224-3158

EPA RCRA ID No. NONE

ON

May 23, 2016

BY

Booz Allen Hamilton

FOR

U.S. ENVIRONMENTAL PROTECTION AGENCY

Region 7

Environmental Sciences & Technology Division

INTRODUCTION

At the request of the Environmental Sciences & Technology Division (ENST) and the Environmental Field Compliance Branch (EFCB) of the U.S. Environmental Protection Agency (EPA) Region 7, Booz Allen Hamilton (Booz Allen) conducted a Resource Conservation and Recovery Act (RCRA) Compliance Evaluation Inspection (CEI) on May 23, 2016 at Recycletronics (Recycletronics) located in Sioux City, Iowa. The CEI was conducted under the authority of Section 3007(a) of RCRA, as amended. Booz Allen gathered information and data necessary for the EPA to determine compliance with applicable regulatory and statutory requirements. During the CEI it was discovered that Recycletronics currently is a non-generator of hazardous waste. The CEI was conducted as a level B Multimedia Screening Inspection, and the *Region 7 Multimedia Screening Checklist* is included as Attachment 1.

Recycletronics was last inspected on June 16, 2015 by an EPA contractor. The facility was cited at the end of the inspection for failing to minimize the possibility of a release.

PARTICIPANTS

The following persons participated in the CEI. A copy of the business card obtained from the facility representative during the CEI is included in Attachment 2.

Facility Representatives, Recycletronics:

Name	Title	E-mail/fax	Phone
Aaron Rochester	President	recycletronicsgm@cableone.net fax: (712) 224-3161	(712) 224-3158
Evere Gutierrez	Office Manager	recycletronicsgm@cableone.net fax: (712) 224-3161	(712) 224-3158

EPA Representative, Booz Allen:

Name	Title	E-mail/fax	Phone
Clifford A. Nelles	Environmental Specialist	nelles_clifford@ne.bah.com fax (816) 448-3801	(816) 448-3254

INSPECTION PROCEDURE

I arrived at Recycletronics at approximately 0915 hours on May 23, 2016 to conduct the visual reconnaissance. The visual reconnaissance was conducted to identify and document potential areas of concern from the adjacent roadways. I identified no environmental issues or areas of concern during this preliminary examination.

At approximately 0920 hours, I approached the main entrance and encountered Mr. Evere Gutierrez, I introduced myself to Mr. Gutierrez and explained the purpose of the CEI to him and asked to speak with the manager or owner. Mr. Gutierrez escorted me to the office of Mr. Aaron Rochester I introduced myself to Mr. Rochester, and explained the purpose of the CEI to him. I conducted the entry briefing in Mr. Rochester's office. I presented my EPA credential letter and business card to Mr. Rochester. During the entry briefing, I presented to Mr. Rochester a letter and business card from the EPA Task Order Contracting Officer's Representative (TOCOR), Mr. Gary Witkovski. I also presented Mr. Rochester with a copy of RCRA §3007(a) (stipulating hazardous waste inspection authority) and a copy of 42 U.S.C. 1001/1002 (requiring the provision of truthful and accurate information and documentation). These documents were read by Mr. Rochester prior to proceeding with the CEI.

I then explained the EPA policy regarding the collection of confidential business information (CBI) to Mr. Rochester. I stated that, at the conclusion of the CEI, he would be presented with the EPA *Confidentiality Notice*. At that time, a CBI claim could or could not be made for any or all of the information collected during the CEI.

The CEI consisted of a discussion of facility operations, waste generation and waste management practices; review of pertinent records; visual inspection; and an exit briefing. Mr. Rochester

acted as the official facility representative during the CEI, and accompanied me during the visual inspection. Mr. Gutierrez also participated in the inspection.

I completed the CEI and summarized my findings and recommendations on May 23, 2016 with Mr. Rochester. Based upon the initial observations, **I did not issue a Notice of Preliminary Findings (NOPF) to Recycletronics at the conclusion of the CEI.**

During the exit briefing, Mr. Rochester acknowledged receipt of the Confidentiality Notice (Attachment 3) with his signature. Mr. Rochester read and signed the Confidentiality Notice indicating no confidential business information had been provided during the CEI. Mr. Rochester acknowledged receipt of a Receipt for Documents and Samples (Attachment 4) A total of eight (8) photographs were taken during the CEI, seven (7) of which are included in Attachment 5.

FINDINGS AND OBSERVATIONS

Facility Operations

Recycletronics was originally organized as a not-for-profit in 1990 as Disabled Veterans at Work. It was reorganized in 2011 as a for profit corporation and moved into the present facility in 2013. Recycletronics collects used electronic equipment (computer monitors, computers, printers, and televisions) from landfills, and by staging recycling events where homeowners and businesses drop off their used electronic equipment for recycling in various cities. The used electronic equipment is then disassembled by Recycletronics and the components [wiring, circuit boards, cathode ray tubes (CRT), monitors, and cases] are then sorted for recycling.

Recycletronics processes CRTs for recycling by separating leaded glass from other components, this is done by taking CRTs to the glass room to separate into leaded and unleaded glass debris. All other electronic equipment is bundled on pallets and sold as-is to brokers for reuse or recycling. During the entry briefing I explained to Mr. Rochester that I would be asking for copies of Bills of Lading, invoices, and work orders. Mr. Rochester explained that the office computer that Mr. Gutierrez operated had just crashed on May 20, 2016 and that they did not have access to the company records. The facility consists of one building of approximately 16,000 sq. ft. Recycletronics's North American Industrial Classification System (NAICS) code is 811212 (Computer and Office Machine Repair and Maintenance without retailing New Computers).

Facility Status

Before conducting the CEI I received a series of emails on April 07, 2016 from Deborah Bredehoft (EPA) and Gary Witkovski (EPA) detailing previous interactions between Recycletronics the Iowa Department of Natural Resources (IDNR), Nebraska Department of Environmental Quality (NDEQ), and the EPA regarding the operations at Recycletronics a copy of the emails is included in Attachment 6. On May 16, 2016 I conducted a phone conversation with Mr. Steve Griebel (IDNR) to see if he had any more information from Mr. Tony Wingert (Attachment 6, page 1). Mr. Griebel did not have any more information. I then contacted Mr. Wingert and he agreed to meet with me on Monday May 23, 2016 at 0900 hours in his office to discuss his information. I arrived at the Woodbury County Sheriff's Office at 0900 on

May 23, 2016. Mr. Wingert stated that in March 2016 an anonymous informant had contacted him and that the informants' conscious was bothering him about the way that the lead from the CRTs was being managed. The informant told Mr. Wingert that the lead was being sold to be mixed in with concrete for paving. After leaving Mr. Wingert I then proceeded to the facility at 3313 Northbrook Drive. When I arrived there I observed that the facility was not empty, but that Recycletronics is still in operation. I then proceeded to conduct a full CEI at the Recycletronics facility.

During the CEI, I determined Recycletronics's hazardous waste generation rate through interviews with facility personnel and record review.

Facility Waste Streams

The following is a Waste Stream and Waste Handling Table for Recycletronics. The table describes the major waste streams generated on-site, waste management practices, and off-site treatment, storage, and disposal. A description of the major waste streams and management practices is also found in the *CEI Worksheets and Checklists* (Attachment 7).

Waste Stream and Waste Handling Table Recycletronics– Sioux City, IA					
Name of Waste Stream	Hazardous Determination	Generating Process	Estimated Generation Rate	On-Site Management	Off-Site Management
1) Unleaded Glass	Nonhazardous by testing Toxic Characteristic Leaching Procedure (TCLP)	Disassembly of used electronic equipment	Unknown	Fiberboard containers in warehouse	Picked up by L.P. Gill for recycling at L.P. Gill Landfill in Jackson, NE.
2) General Trash	Nonhazardous by product/process knowledge	Office and facility refuse	Unknown	Various containers throughout the facility	Picked up by Waste Management for transport to the Woodbury County Landfill

Visual Inspection

The facility manufacturing activities generate the solid wastes listed in the Waste Stream and Waste Handling Table above. During the CEI, the generation and accumulation areas associated with these wastes were visually inspected. No site map was available for the facility but a Google Earth Image with the various areas noted is included as Attachment 8

In the main area of the facility the used electronic equipment is disassembled on workbenches using air driven tools. After disassembling the components are sorted and put into 1 cubic yard fiberboard containers, the circuit boards, wiring, and monitor parts, are sold as-is online, and the plastics are sent to SW Recycling in Willmar, MN. The unleaded glass is sent to L.P. Gill Landfill in Jackson, NE for recycling. Copies of scale tickets for L.P. Gill Landfill emailed to Mr. Rochester by L.P. Gill Landfill on May 23, 2016 and dated January 12, 19, 20, and 28, 2016 are included in Attachment 9. Mr. Rochester stated that the leaded glass is sent to either The Doe Run Company in Doe Run, Missouri or Closed Loop Refining and Recovery in Phoenix, Arizona for recycling. Mr. Rochester contacted the shipping company that he used and requested that they either fax or email the invoices to him. After several calls to the company that day he had still not received them by the end of the CEI. I then instructed Mr. Rochester to send the invoices to me either by fax or email to the fax number or email address on my business card that I gave him in the entry briefing. A copy of the emails sent from me to Mr. Rochester on May 31, 2016 and June 01, 2016 requesting this information is included as Attachment 10. At the time of the writing of this report I have not received the requested information.

I asked Mr. Rochester if a hazardous waste determination has been made on the unleaded glass that is sent to the landfill. He stated that a determination has been made through testing. A reference in Attachment 6, page 4 to TCLP data sent to the EPA on September 18, 2015 states that the unleaded glass is below TCLP levels.

In the Glass room I observed a 1-cubic yard container for unleaded glass and scrap metal (Attachment 5, Photo 1). In the Glass room the leaded glass from CRTs and the unleaded glass is sorted into different containers. When a container of leaded glass is full the lid is put on it and the lid and container is shrink wrapped. In the Glass room I observed a bundled container of leaded glass ready for shipment (Attachment 5, Photo 2). I asked Mr. Gutierrez how often the facility ships out leaded glass. He stated that leaded glass is only shipped out when they have a semi-trailer load ready, and the quantity on hand and what they ship out varies as there is not a steady influx of used electrical equipment for processing. He also stated that shipments of processed used electronic equipment parts and unleaded glass only go out when they have a full trailer load.

In the main warehouse area I observed over 50 fiberboard containers of unprocessed used electronic equipment including CRTs (Attachment 5, Photo 3). The unprocessed equipment containers almost completely fill the warehouse to capacity.

In the front of the facility outside on the driveway I observed 24 bales of processed electronic equipment waste (Attachment 5, Photo 4). The bales hold plastic and metal ready to be sent to be recycled. In the front of the facility outside on the driveway I observed 24 1-cubic yard containers of unprocessed electronic equipment waste (Attachment 5, Photo 5). I asked Mr. Rochester why the containers of unprocessed equipment were setting outside. He stated that the facility had just conducted a recycling event the previous week and that they had received eight semi-trailer loads of used electronic equipment on the weekend. He also stated that he has an agreement with the City of Sioux City, Iowa that he will have all of the unprocessed equipment inside by Wednesday May 25, 2016. Before leaving the facility I photographed the front from the roadway (Attachment 5, Photos 6-7). All of the material in Photos 4 and 5 are in between the white bus and the red bus in Photo 7.

I asked Mr. Rochester if Recycletronics performed the maintenance on their fork truck. He stated that the maintenance was performed by Riekes Equipment Company directly across the street from the facility. He also stated when maintenance was needed the fork truck was driven over there and the maintenance performed then. A copy of a bill for fork truck maintenance from Riekes Equipment dated May 19, 2016 is included as Attachment 11.

During the visual inspection I did not observe any used oil or universal waste in storage. I asked Mr. Rochester if the facility has generated any waste lamps. He stated that since they moved into the facility in 2013 they have not had to replace any used lamps. I asked Mr. Rochester if he owned the facility. He stated that he rented the facility from Raintree Properties and that Mr. Dan Henderson was his landlord and has been for the last three years.

Records

- Invoices from L.P. Gill dated January 12, 19, 20, and 28, 2016 (Attachment 9)

Since Recycletronics computer had crashed three days before the inspection and Mr. Rochester had not received the requested invoices by the end of the CEI there were no other records to review.

On May 23, 2016, I conducted an exit interview with Mr. Rochester. I explained the findings and observations noted during the CEI, and the regulations pertaining to each. Additionally, I provided Mr. Rochester with copies of the following materials:

- Copy of RCRA §3007(a)
- Copy of 42 U.S.C. 1001/1002
- EPA Information Sheet: *Commercial Motor Vehicle Transportation System Security & Safety-CMV Transportation Security Planning*
- EPA Homeland Security Bulletin: *US EPA Region 7, December 2001, Security Awareness for Agricultural/Industrial Facilities, Pipelines, Transporters, Utilities, Warehouses of Chemicals*

- EPA Supplemental Information for Small Businesses Subject to a U.S. EPA Enforcement Action

SUMMARY

Through a review of current operations and interviews with facility personnel, I determined that Recycletronics is a non-generator of hazardous waste.

Other than items specifically noted in the narrative, I observed no additional issues. However, further review by EPA might change or add to my findings.

Clifford A. Nelles

Date: _____

ATTACHMENTS

- 1: Region 7 Multimedia Screening Checklist (2 pages)
- 2: Copies of Facility Representatives' Business Card (1 page)
- 3: Copy of the EPA Confidentiality Notice (1 page)
- 4: Copy of Receipt of Documents (1 page)
- 5: Photographic Documentation (5 pages)
- 6: Copy of Emails from Deborah Bredehoft and Gary Witkovski (12 pages)
- 7: CEI Worksheets and Checklists (8 pages)
- 8: Copy of Google Earth Image (1 page)
- 9: Copy of Scale Tickets from L.P. Gill (3 pages)
- 10: Copy of Emails sent from Clifford Nelles to Aaron Rochester dated May 31, 2016 and June 01, 2016 (1 page)
- 11: Copy of a Bill from Riekes Equipment for fork truck maintenance dated May 19, 2016 (1 page)

Facility Name / City: RECYCLETRONICS
3313 Northbrook Drive
SIOUX CITY, IA 51105

Facility ID #: NONE

Date: May 23, 2016

Photographer: Clifford A. Nelles

Type of Camera: Sony Digital Still Camera, DSC-W690, Serial #6653306

Digital Recording Media: Memory Stick

All digital photos were copied by: Rebecca A. Wenner on June 10, 2016

All digital photos were copied to: to print and CD-R

Original copy is stored in: CD-R. All digital photos were downloaded to CD-R by Rebecca A. Wenner on June 10, 2016. No changes were made in the original image files prior to print and storage on the CD-R.

Report Photo #	Photographer	Date	Approx. Time	File Name (DSC00xxx.jpg)	Description
1	Clifford A. Nelles	05/23/16	0944	026	Photo not used in report.

PHOTO LOG

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Report Photo #	Photographer	Date	Approx. Time	File Name (DSC00xxx.jpg)	Description
1	Clifford A. Nelles	05/23/16	0943	0025	1 cubic yard non-lead storage container in warehouse. Container holds non-lead glass and scrap metal
2	Clifford A. Nelles	05/23/16	0945	027	Lead glass bundled ready for shipment. When the 1 cubic yard container is full the lid is put on to it and the container is shrink wrapped.
3	Clifford A. Nelles	05/23/16	0946	028	50 unprocessed containers of electronic equipment waste inside of facility
4	Clifford A. Nelles	05/23/16	0949	029	24 bales of processed electronic equipment waste outside of building. Waste is plastic and metal ready to be sent to be recycled
5	Clifford A. Nelles	05/23/16	0949	030	24 1-cubic yard containers of unprocessed electronic equipment waste outside of the building
6	Clifford A. Nelles	05/23/16	1025	031	Westside of the front of the building looking North. Photo taken from Northbrook Drive
7	Clifford A. Nelles	05/23/16	1025	032	Eastside of the front of the building looking North. Photo taken from Northbrook Drive. Material shown in Photos 4 and 5 is located in between the white bus and the red bus.

Photos Not Included in CEI Report

RECYCLETRONICS
SIOUX CITY, IA

Photos Not Included in CEI Report

Photo Number: 1
Photographer: Clifford Nelles
Date: 05/23/2016
Time: 0944
Description: Photo not used in
report.

